

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

DEFENSE DISTRIBUTED,

Plaintiff

v.

**PAMELA BONDI in her Official
Capacity as Attorney General of the
United States, *et al.*,**

Defendants.

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Civil Action No. 4:22-cv-00691-O

Defense Distributed's Motion for a Preliminary Injunction

**Defense Distributed's
Motion for a Preliminary Injunction**

Defense Distributed moves for an order preliminarily enjoining the Defendants from enforcing the challenged redefinition of “firearm” in 27 C.F.R. §§ 478.11 and 27 C.F.R. §§ 478.12, *see* Definition of “Frame or Receiver” and Identification of Firearms, 87 Fed. Reg. 24,652 (Apr. 26, 2022), against Defense Distributed vis-à-vis the following items:

1. The Polymer80 80% Frame as sold by Defense Distributed on ghostgunner.com before the Rule took effect.
2. The M1911 80% Frame:45ACP as sold by Defense Distributed on ghostgunner.com before the Rule took effect.
3. The M1911 80% Frame:9mm/10mm/.8 Super/.40 S&W as sold by Defense Distributed on ghostgunner.com before the Rule took effect.
4. The G80 Build Kit as sold by Defense Distributed on G80.com.
5. The G80 Unfinished Receiver as sold by Defense Distributed on G80.com.
6. The G80 Grip Module as sold by Defense Distributed on G80.com.

A brief and evidence support this motion. The motion is opposed.

Respectfully submitted,

By /s/ Chad Flores

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Counsel for Defense Distributed

Certificate of Conference

Defendants oppose this motion. Counsel for Defense Distributed confirmed that by conferring via email with counsel for the Defendants.

/s/ Chad Flores
Chad Flores

Certificate of Service

A true and correct copy of the foregoing document was served via the Court's CM/ECF system to all counsel of record on the day of its filing.

/s/ Chad Flores
Chad Flores